

**Mark David Goss**

Member

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May 12, 2011

HAND DELIVERED

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602

RECEIVED

MAY 12 2011

PUBLIC SERVICE  
COMMISSION

Re: PSC Case No. 2011-00148

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten copies of East Kentucky Power Cooperative, Inc.'s Motion to Place Case in Abeyance and to Schedule an Informal Conference.

Very truly yours,

  
Mark David Goss  
Counsel

Enclosures

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>THE FILING OF NEW DEMAND SIDE</b>	)	
<b>MANAGEMENT TARIFFS BY EAST KENTUCKY</b>	)	<b>CASE NO.</b>
<b>POWER COOPERATIVE, INC. AND 11 OF ITS</b>	)	<b>2011-00148</b>
<b>MEMBER DISTRIBUTION COOPERATIVES</b>	)	

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**MOTION TO PLACE CASE IN ABEYANCE AND TO  
SCHEDULE INFORMAL CONFERENCE**

Comes now, East Kentucky Power Cooperative, Inc. (“EKPC”), by and through counsel, and respectfully moves the Kentucky Public Service Commission (“Commission”) to issue an Order placing this case in abeyance for a period of at least sixty (60) days following the entry of such Order. In support of this motion, EKPC states as follows:

1. On April 29, 2011, the Commission issued an Order requesting additional information relating to three new Demand Side Management (“DSM”) tariffs<sup>1</sup> for which EKPC had requested Commission approval. This Order included information requests to both EKPC and 11 of its member distribution cooperatives. Based on the information requests contained in the Order, EKPC and the member distribution cooperatives realized that substantial discussion, review and clarification was needed between EKPC, each of the member systems and the Commission staff with regard to the development and execution of appropriate and cost-effective demand side management programs. EKPC and the member systems request that this additional

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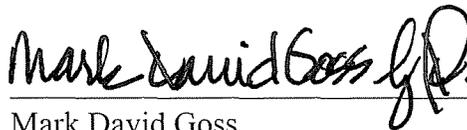
<sup>1</sup> New DSM Tariffs consist of: Section DSM-4, Dual Fuel Program; Section DSM-5, Commercial and Industrial Advanced Lighting Program; and, Section DSM-6, Industrial Compressed Air Program.

clarification be accomplished through the vehicle of an Informal Conference with Commission Staff before responding to information requests.

2. This Motion is being made at the request not only of EKPC, but also on behalf of each of the 11 member systems that require responses in this matter, as well as on behalf of the remaining five member systems that are not required to file responses.

WHEREFORE, EKPC respectfully requests that the Commission issue an Order: placing this case in abeyance for a period of at least sixty (60) days following entry of an Order of the Commission; that an Informal Conference be scheduled as soon as is practicable considering the Commission staff's schedule in order to address these issues; and, that the portion of the Commission's April 29, 2011 Order (ordering paragraph three) requiring that EKPC and each of its 16 distribution cooperatives file written responses to the questions of Commission staff contained in the Appendix, be set aside consistent with placement of the case into abeyance.

This 12<sup>th</sup> day of May, 2011.

A handwritten signature in black ink that reads "Mark David Goss" followed by a stylized monogram "gtd". The signature is written over a horizontal line.

Mark David Goss  
Counsel for East Kentucky Power Cooperative, Inc.  
Frost Brown Todd, LLC  
250 W. Main Street, Suite 2800  
Lexington, KY 40507-1749

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion to Place Case in Abeyance was sent to the following parties of record by U.S. Mail, postage prepaid, on this 12<sup>th</sup> day of May 2011.

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